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February 3, 2022

Also admitted in New Jersey

Via ECF

Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street, Room 2230
New York, New York 10007

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**Re: *Computer Sciences Corporation v. Endurance Risk Solutions Assurance Co. et al.*,
Case No. 1:20-cv-01580 (MKV) S.D.N.Y. (filed February 21, 2020)**

Dear Judge Vyskocil:

Our firm represents Endurance Risk Solutions Assurance Co. (“Endurance” or “Defendant”) in the above-referenced case. We are writing pursuant to Section 9.B. of Your Honor’s Individual Practice Rules to respectfully request leave to file our Motion to Enforce the Settlement Agreement between Computer Sciences Corporation (“CSC” or “Plaintiff”) and Endurance as partially redacted, as to the affidavit and memorandum of law, and under seal, as to the exhibits accompanying the affidavit.

Pursuant to Your Honor’s Rules, to be approved, any redaction or sealing of a court filing must be narrowly tailored to serve whatever purpose justifies the redaction or sealing and must be otherwise consistent with the presumption in favor of the public access to judicial documents. *See, e.g., Lugosch v. Pyramid Co. of Onondaga*, 435 F. Ed 110, 119-20 (2d Cir. 2006). On January 18, 2022, Your Honor granted our request to file our pre-motion letter regarding this motion under seal. Our Motion to Enforce the Settlement Agreement discusses confidential settlement negotiations between the parties and therefore, in an abundance of caution, Endurance seeks permission to file redacted versions of the memorandum of law and affidavit, and to file the exhibits under seal to avoid any potential conflict with Rule 408 of the Federal Rules of Evidence.

Respectfully submitted,

A handwritten signature in black ink that reads "E. Kerstein".

Erica J. Kerstein




Honorable Mary Kay Vyskocil
February 3, 2022
Page 2

cc: All Counsel of Record (*via* ECF)

Granted. SO ORDERED.

Date: 2/3/2022
New York, New York


Mary Kay Vyskocil
United States District Judge